

BAUTE CROCHETIERE & HARTLEY LLP  
777 South Figueroa Street, Suite 3800  
Los Angeles, CA 90017  
Tel (213) 630-5000 • Fax (213) 683-1225

**HEJMANOWSKI & McCREA LLC**

PAUL R. HEJMANOWSKI (#94)

CHARLES H. McCREA (#104)

520 South Fourth Street, Suite 320

Las Vegas, Nevada 89101

Telephone: (702) 834-8777

Facsimile: (702) 834-5262

prh@hmlawlv.com

chm@hmlawlv.com

**BAUTE CROCHETIERE & HARTLEY LLP**

MICHAEL J. HARTLEY (Admitted *Pro Hac Vice*)

COURTNEY A. PALKO (Admitted *Pro Hac Vice*)

777 South Figueroa Street, Suite 3800

Los Angeles, California 90017

Telephone: (213) 630-5000

Facsimile: (213) 683-1225

mhartley@bautelaw.com

cpalko@bautelaw.com

Attorneys for Defendant

National Union Fire Insurance Company of

Pittsburgh, Pa.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAS VEGAS SANDS, INC. n/k/a LAS  
VEGAS SANDS, LLC; and LAS VEGAS  
SANDS CORP.,

Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA.,

Defendant.

Case No. 2:22-cv-00461-JCM-BNW

Hon. James C. Mahan

**CORRECTED STIPULATION PER  
CLERK'S NOTICE AND [PROPOSED]  
ORDER TO EXTEND BRIEFING  
SCHEDULE ON PLAINTIFFS' MOTION  
TO STAY DISCOVERY PENDING  
RESOLUTION OF PLAINTIFFS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT [ECF #50]**

**(FIRST REQUEST)**

Plaintiffs Las Vegas Sands, Inc. n/k/a Las Vegas Sands, LLC, and Las Vegas Sands Corp. (“Plaintiffs”) and Defendant National Union Fire Insurance Company of Pittsburgh, Pa. (“National Union”) (collectively the “Parties”), by and through their respective counsel of record, hereby stipulate to extend the briefing schedule for Plaintiffs’ Motion to Stay Discovery Pending Resolution of Plaintiffs’ Motion for Partial Summary Judgment (“Motion to Stay”) (ECF #50), subject to the Court’s approval, as follows:

1. In light of the holidays, the Parties jointly request an extension of their briefing schedule for the above-referenced motion to allow the Parties sufficient time to complete their opposition and reply. This is the Parties’ first request to extend these deadlines. The Parties agree there is good cause to support the requested extension.

2. On December 23, 2022, Plaintiffs’ filed their Motion to Stay (ECF #50). National Union’s opposition is currently due on January 6, 2023, and Plaintiffs’ reply is currently due on January 13, 2023.

3. On December 27, 2022, the Court (Magistrate Judge Weksler) issued a minute order setting a hearing on the Motion to Stay for January 25, 2023 at 1:00 p.m. ECF #52.

4. The Parties have agreed to the following briefing schedule for the Motion to Stay, subject to the Court’s approval: (a) National Union’s opposition will be filed by January 11, 2023; and (b) Plaintiffs’ reply will be filed by January 18, 2023.

5. The Parties are available for the January 25, 2023 hearing date, or will be available at a future date if the Court continues the hearing in light of the Parties’ requested extension to the briefing schedule.

Event	Existing Date	Proposed Date
National Union’s Opposition to Plaintiffs’ Motion to Stay	January 6, 2023	January 11, 2023
Plaintiffs’ Reply in Support of Motion	January 13, 2023	January 18, 2023

1 to Stay		
2 Hearing Date	January 25, 2023	January 25, 2023 (or a future
3		date convenient for the Court)

4  
5 **IT IS SO STIPULATED.**

6 Respectfully submitted,

7 DATED: January 3, 2023

HEJMANOWSKI & McCREA LLC  
BAUTE CROCHETIERE & HARTLEY LLP

9 By: /s/ Michael J. Hartley

10 Michael J. Hartley  
11 Attorneys for Defendant National Union Fire  
Insurance Company of Pittsburgh, Pa.

12  
13 DATED: January 3, 2023

KEMP JONES, LLP  
COHEN ZIFFER FRENCHMAN & McKENNA LLP

15 By: /s/ Marc T. Ladd

16 Marc T. Ladd  
17 Attorneys for Plaintiffs

18  
19 **IT IS SO ORDERED.**

20  
21 

22 Hon. Brenda N. Weksler  
23 United States Magistrate Judge

24 Dated: January 4, 2023

BAUTE CROCHETIERE & HARTLEY LLP  
777 South Figueroa Street, Suite 3800  
Los Angeles, CA 90017  
Tel (213) 630-5000 • Fax (213) 683-1225